

# EXHIBIT A

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and NAVROZ HAJI

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF CALIFORNIA

SCHNEIDER RUCINSKI ENTERPRISES, )  
a California corporation, )

Plaintiff, )

vs. )

TOUCH ASIA OUTSOURCING )  
SOLUTIONS, INC., et al., )

Defendants. )

Case No. 08-CV-0138 WQH POR

**AMENDED ANSWER OF**  
**DEFENDANTS COLO 6, LLC**  
**AND NAVROZ HAJI**

Defendants Colo 6, LLC and and Navroz Haji, by their undersigned counsel, for their answer to the complaint filed January 23, 2008 by plaintiff Schneider Rucinski Enterprises, admit, deny and allege as follows:

**ALLEGATIONS COMMON TO ALL CAUSES OF ACTION**

1. Answering Paragraphs 1, 2, 3, 4, 5, 6, 7, 8 and 9 of Plaintiff's complaint, Defendants are without knowledge or information sufficient to form a belief as to the truth or falsify of the allegations therein, and therefore deny each and every allegation contained therein.
2. Answering Paragraph 10, Defendants admit that Navroz Haji is a resident of the State of California, County of Las Angeles, but deny that Mr. Haji was doing business in the

1 County of San Diego, California during the relevant periods set forth in the Verified  
2 Complaint.

3 3. Answering Paragraph 11, Defendants admit that COLO 6, LLC is a duly organized and  
4 existing California limited liability company, but deny the company was or is doing  
5 business in the County of San Diego, during the relevant periods set forth in the Verified  
6 Complaint.

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8 4. Answering Paragraph 12, Defendants are without knowledge or information sufficient to  
9 form a belief as to the truth or falsify of the allegations therein and therefore deny each  
10 and every allegation contained therein.

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12 5. Answering Paragraph 13, Defendants are without knowledge or information sufficient to  
13 form a belief as to the truth or falsify of the allegations therein, and therefore deny each  
14 and every allegation contained therein.

15 6. Answering Paragraph 14, deny the allegations contained therein.

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17 7. Answering Paragraph 15, Defendants are without knowledge or information sufficient to  
18 form a belief as to the truth or falsify of the allegations therein and therefore deny each  
19 and every allegation contained therein.

20 **FIRST CAUSE OF ACTION**

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22 8. Answering paragraph 16, Defendants hereby incorporate by reference each and every  
23 response contained in paragraphs 1-7, above, and re-allege the same as if fully set forth  
24 herein.

25 9. Answering Paragraphs 17, 18, 19, 20, 21, 22, 23, 24 and 25 Defendants are without  
26 knowledge or information sufficient to form a belief as to the truth or falsify of the  
27 allegations therein, and therefore deny each and every allegation contained therein.  
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**SECOND CAUSE OF ACTION**

10. Answering paragraph 25, Defendants hereby incorporate by reference each and every response contained in paragraphs 1-9, above, and re-allege the same as if fully set forth herein.

11. Answering paragraphs 26, 27 and 28 Defendants are without knowledge or information sufficient to form a belief as to the truth or falsify of the allegations therein, and therefore deny each and every allegation contained therein.

**THIRD CAUSE OF ACTION**

12. Answering paragraph 29, Defendants hereby incorporate by reference each and every response contained in paragraphs 1-11, above, and re-allege the same as if fully set forth herein.

13. Answering paragraphs 30, 31, 32, 33, 34, 35 and 36, Defendants are without knowledge or information sufficient to form a belief as to the truth or falsify of the allegations therein, and therefore deny each and every allegation contained therein.

**FOURTH CAUSE OF ACTION**

14. Answering paragraph 37, Defendants hereby incorporate by reference each and every response contained in paragraphs 1-13, above, and re-allege the same as if fully set forth herein.

15. Answering paragraphs 38, 39, 40, and 41, Defendants are without knowledge or information sufficient to form a belief as to the truth or falsify of the allegations therein, and therefore deny each and every allegation contained therein.

**FIFTH CAUSE OF ACTION**

1 16. Answering paragraph 42, Defendants hereby incorporate by reference each and every  
2 response contained in paragraphs 1-15, above, and re-allege the same as if fully set forth  
3 herein.

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5 17. Answering paragraphs 43 and 44, Defendants are without knowledge or information  
6 sufficient to form a belief as to the truth or falsify of the allegations therein, and therefore  
7 deny each and every allegation contained therein.

8 **SIXTH CAUSE OF ACTION**

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10 18. Answering paragraph 45, Defendants hereby incorporate by reference each and every  
11 response contained in paragraphs 1-17, above, and re-allege the same as if fully set forth  
12 herein.

13 19. Answering paragraphs 46 and 47, Defendants are without knowledge or information  
14 sufficient to form a belief as to the truth or falsify of the statements therein and therefore  
15 deny each and every allegation contained therein.

16 **SEVENTH CAUSE OF ACTION**

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18 20. Answering paragraph 48, Defendants hereby incorporate by reference each and every  
19 response contained in paragraphs 1-19, above, and re-allege the same as if fully set forth  
20 herein.

21 21. Answering paragraphs 49, 50, 51, 52, 53, 54, 55, and 56, Defendants are without  
22 knowledge or information sufficient to form a belief as to the truth or falsify of the  
23 allegations therein and therefore deny each and every allegation contained therein.

24 **EIGHTH CAUSE OF ACTION**

1 22. Answering paragraph 57, Defendants hereby incorporate by reference each and every  
2 response contained in paragraphs 1-21, above, and re-allege the same as if fully set forth  
3 herein.

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5 23. Answering paragraphs 58, 59, and 60, Defendants are without knowledge or information  
6 sufficient to form a belief as to the truth or falsify of the allegations therein and therefore  
7 deny each and every allegation contained therein.

8 **NINTH CAUSE OF ACTION**

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10 24. Answering paragraph 61, Defendants hereby incorporate by reference each and every  
11 response contained in paragraphs 1-23, above, and re-allege the same as if fully set forth  
12 herein.

13 25. Answering paragraphs 62 and 63, Defendants are without knowledge or information s  
14 sufficient to form a belief as to the truth or falsify of the allegations therein and therefore  
15 deny each and every allegation contained therein.

16 **TENTH CAUSE OF ACTION**

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18 26. Answering paragraph 64, Defendants hereby incorporate by reference each and every  
19 response contained in paragraphs 1-25, above, and re-allege the same as if fully set forth  
20 herein.

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22 27. Answering paragraphs 65, 66, and 67, Defendants are without knowledge or information  
23 sufficient to form a belief as to the truth or falsify of the allegations therein and therefore  
24 deny each and every allegation contained therein.

25 **ELEVENTH CAUSE OF ACTION**

1 28. Answering paragraph 68, Defendants hereby incorporate by reference each and every  
2 response contained in paragraphs 1-27, above, and re-allege the same as if fully set forth  
3 herein.

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5 29. Answering paragraphs 69, 70, 71, and 72, Defendants are without knowledge or  
6 information sufficient to form a belief as to the truth or falsify of the allegations therein  
7 and therefore deny each and every allegation contained therein.

8 **TWELFTH CAUSE OF ACITON**

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10 30. Answering paragraph 73, Defendants hereby incorporate by reference each and every  
11 response contained in paragraphs 1-29, above, and re-allege the same as if fully set forth  
12 herein.

13 31. Answering paragraphs 74, 75, and 76, Defendants are without knowledge or information  
14 sufficient to form a belief as to the truth or falsify of the allegations therein, and therefore  
15 deny each and every allegation contained therein.

16 **THIRTEENTH CAUSE OF ACTION**

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18 32. Answering paragraph 77, Defendants hereby incorporate by reference each and every  
19 response contained in paragraphs 1-31, above, and re-allege the same as if fully set forth  
20 herein.

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22 33. Answering paragraphs 78, 79 and 80, Defendants are without knowledge or information  
23 sufficient to form a belief as to the truth or falsify of the allegations therein, and therefore  
24 deny each and every allegation contained therein.

25 **FOURTEENTH CAUSE OF ACTION**

1 34. Answering paragraph 81, Defendants hereby incorporate by reference each and every  
2 response contained in paragraphs 1-33, above, and re-allege the same as if fully set forth  
3 herein.

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5 34. Answering paragraphs 82, 83, and 84, Defendants are without knowledge or information  
6 sufficient to form a belief as to the truth or falsify of the statements therein and therefore  
7 deny each and every allegation contained therein.

8 **FIFTEENTH CAUSE OF ACTION**

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10 35. Answering paragraph 85, Defendants hereby incorporate by reference each and every  
11 response contained in paragraphs 1-34, above, and re-allege the same as if fully set forth  
12 herein.

13 36. Answering paragraphs 86, 87, and 88, Defendants are without knowledge or information  
14 sufficient to form a belief as to the truth or falsify of the allegations therein and therefore  
15 deny each and every allegation contained therein.

16 **SIXTEENTH CAUSE OF ACTION**

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18 37. Answering paragraph 89, Defendants hereby incorporate by reference each and every  
19 response contained in paragraphs 1-36, above, and re-allege the same as if fully set forth  
20 herein.

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22 38. Answering paragraphs 89, 90, 91 and 92, Defendants are without knowledge or  
23 information sufficient to form a belief as to the truth or falsify of the allegations therein  
24 and therefore deny each and every allegation contained therein.

25 **SEVENTEENTH CAUSE OF ACTION**



1 39. Answering paragraph 93, Defendants hereby incorporate by reference each and every  
2 response contained in paragraphs 1-38, above, and re-allege the same as if fully set  
3 forth herein.

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5 40. Answering paragraphs 94, 95, 96, 97 and 98, Defendants are without knowledge or  
6 information sufficient to form a belief as to the truth or falsify of the allegations therein  
7 and therefore deny each and every allegation contained therein.

8 **EIGHTEENTH CAUSE OF ACTION**

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10 41. Answering paragraph 99, Defendants hereby incorporate by reference each and every  
11 response contained in paragraphs 1-40, above, and re-allege the same as if fully set forth  
12 herein.

13 42. Answering paragraphs 100, 101 and 102, Defendants are without knowledge or  
14 information sufficient to form a belief as to the truth or falsify of the allegations therein  
15 and therefore deny each and every allegation contained therein.

16 **NINETEENTH CAUSE OF ACTION**

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18 43. Answering paragraph 103, Defendants hereby incorporate by reference each and every  
19 response contained in paragraphs 1-42, above, and re-allege the same as if fully set forth  
20 herein.

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22 44. Answering paragraphs 103, 104, 105 and 106, Defendants are without knowledge or  
23 information sufficient to form a belief as to the truth or falsify of the allegations therein  
24 and therefore deny each and every allegation contained therein.

25 **TWENTIETH CAUSE OF ACTION**

1 45. Answering paragraph 107, Defendants hereby incorporate by reference each and every  
2 response contained in paragraphs 1-44, above, and re-allege the same as if fully set forth  
3 herein.

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5 46. Answering paragraphs 108, 109, and 110, Defendants are without knowledge or  
6 information sufficient to form a belief as to the truth or falsity of the allegations therein  
7 and therefore deny each and every allegation contained therein.

8 As and for separate and affirmative defenses, Defendants allege:

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10 FIRST AFFIRMATIVE DEFENSE

11 The Court lacks subject matter jurisdiction because complete diversity is lacking between  
12 plaintiff and these answering parties, all of whom are residents of California.

13 SECOND AFFIRMATIVE DEFENSE

14 Each purported claim for relief fails to state a claim for which the Court may grant relief  
15 against these answering parties.

16  
17 THIRD AFFIRMATIVE DEFENSE

18 Any and all damages and other relief sought by plaintiff were actually and proximately  
19 caused by third parties other than these answering parties.

20 WHEREFORE, Defendants COLO 6 and NAVROZ HAJI pray:

- 21  
22 1. That the complaint be dismissed;  
23 2. That judgment be entered in favor of these answering parties;  
24 3. That these answering parties be awarded their attorneys fees;  
25 4. That these answering parties be awarded costs of suit; and  
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27  
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